

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DEMOCRATIC NATIONAL COMMITTEE, *et al.*

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE, *et al.*

Defendants.

Civil Action No.: 81-3876 (JMV) (JBC)

**DECLARATION OF JOHN R. PHILIPPE JR.**

I, John R. Phillippe Jr., state the following based on my personal knowledge:

1. I am over 18 years of age and competent to make this Declaration.

2. I am the Chief Counsel of the Republican National Committee (“RNC”), and have served in this position since July 2009. I am responsible for managing the RNC Counsel’s Office and all of the RNC’s day-to-day legal affairs, including protecting the confidentiality of sensitive RNC documents.

3. One of the primary purposes of the RNC is to support Republican candidates in campaigns against opponents from other political parties, most notably the Democratic Party. The RNC raises contributions and spends funds to organize and engage staff, volunteers, independent contractors, and vendors in GOTV activities that are the product of confidential strategic decisions by RNC members, officers, and personnel. Therefore, the RNC vigorously protects the strategic documents and election day plans of its candidates in its possession to ensure they are able to compete effectively against those opponents.

4. I have reviewed, and am familiar with, the strategic memorandum that is the subject of the RNC’s motion to seal. It is a confidential memorandum to presidential campaign

personnel and volunteers. It explains several step-by-step strategies and activities for election day and a potential recount. The memorandum was circulated during the 2016 election, but contains several plans that are likely to be used in or may bear upon future elections. This includes the election for President of the United States in 2020.

5. If political operatives from other parties and campaigns gain access to information about the strategic memorandum and vendor priorities, they are likely to steer financial resources in response to that information. This will put the RNC and Republican candidates at a disadvantage in their competition with the DNC and Democratic candidates.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true.

Executed on September 6, 2018.

A handwritten signature in black ink, appearing to read "JR Phillippe", with a long horizontal line extending to the right.

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John R. Phillippe Jr.